

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL STATEMENT
REGARDING JOINT PROPOSAL FOR THE ADJUDICATION OF EQUITABLE
REMEDIES**

Plaintiffs HEREBY MOVE for leave to file a supplemental statement regarding the parties' Joint Proposal for the Adjudication of Equitable Remedies (ECF No. 1416). In support thereof, Plaintiffs state as follows:

1. On April 24, 2025, after meeting-and-conferring, the parties filed a Joint Proposal regarding the Adjudication of Equitable Remedies ("Joint Proposal") requesting a schedule that permitted additional fact and expert discovery prior to an evidentiary hearing on the appropriate remedy in this matter. (ECF No. 1416).

2. On April 25, 2025, the Court ordered that the parties appear for a hearing on May 2, 2025 to "argue their preliminary positions on the equitable remedies to be imposed, which will enable the Court to determine whether and how much discovery is necessary and appropriate." (ECF No. 1417).

3. Plaintiffs have prepared a supplemental statement (attached hereto) to provide the Court with the benefit of the legal principles and procedural history supporting the parties' Joint Proposal in advance of the May 2 hearing. Plaintiffs respectfully request that the Court consider the contents thereof.

4. Plaintiffs have met-and-conferred with counsel for Google and have provided them with a draft of Plaintiffs' statement. Google does not oppose this motion.

SO ORDERED this ____ day of _____, 2025.

Hon. Leone M. Brinkema
United States District Judge

Dated: April 28, 2025

Respectfully submitted,

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